

From: Association of Bainbridge Communities (ABC)
365 Ericksen Avenue, Suite 327
Bainbridge Island, WA 98110



Date: June 29, 2016

Subject:

ABC Comments on Proposed Plan for Amending the Record of Decision for the Wyckoff/Eagle Harbor Superfund Site (Operable Units 1, 2 and 4)

To: Helen Bottcher, Project Manager
(ECL-122) U.S. EPA Region 10
1200 6th Ave., Suite 900 Seattle, WA 98101
wyckoffcomments@epa.gov

References:

- 1) Proposed Plan for Amending the Record of Decision for the Wyckoff/Eagle Harbor Superfund Site (Operable Units 1, 2 and 4) EPA, April 2016
- 2) Citizen Comments on Wyckoff/Eagle harbor Superfund Site Proposed Plan submitted by Janet Knox June 10, 2016

Dear Ms. Bottcher:

BACKGROUND

It has been 30 years since ABC collected 2,000 signatures asking that the Wyckoff Creosote Facility be placed on the National Priorities List (NPL). This petition was delivered personally in 1986 to our then - U.S Representative in Washington DC. The following year the site was placed on the NPL. Since that time ABC has been actively representing the community on the cleanup working in coordination with EPA. In the past this included having a consultant financed via the first Region 10 Technical Assistance Grant (TAG) and writing articles in ABC's newsletter *Scotch Broom*. More recently ABC members have been serving on the Wyckoff Community Interest Group. There have been many successes and even a few failures over the intervening three decades. In the beginning the goal was for the site to be "cleaned up." We, along I believe with EPA, used this term as if the contaminants would be removed, but as time went on the reality showed that the contamination of the site was worse than expected. For example the *Bainbridge Review* reported (December 10, 1997) that "Divers recently discovered pools of toxic pollutants between 20 and 40 feet wide floating on the floor of Eagle Harbor near the Superfund site." This discovery was recently described in the EPA video (<https://www.youtube.com/watch?v=oz68qSUSsOA>). Also 10 years ago EPA estimated 500,000 gallons of creosote remained underground; the updated estimate is now at 650,000 gallons. The wide extent of contamination and a feasibility analysis sometimes resulted in deciding to cap contaminated areas. This in fact created the west beach and a clean cover layer of the Eagle Harbor bottom. Other areas at the site had acceptable levels of contamination and were in fact "clean." In the end the community is very appreciative to have a sandy west beach, a covered harbor bottom, forested uplands, and a site for the Japanese American Exclusion Memorial. There now remains the polluted Point and its surrounding shoreline. Fortunately this cleanup is facilitated based on now knowing the general locations of the contaminants.

CHOICE OF ALTERNATIVES

The seven alternatives for the upland cleanup are reviewed and rated by EPA in Reference 1. The final selection should involve weighing the following: 1) extent of cleanup, 2) environmental impact, 3) total cost, 4) time for completion, 5) effect on neighborhood, 6) risks, and 7) probability of success. A similar list of these criteria is outlined in Section 9 of Reference 1 – Comparative Analysis. ABC does not have the expertise to carry out a fair evaluation based on either of these two lists of criteria, but does have members who are qualified based on their professional background. One member who submitted comments is Janet Knox (See Reference 2) who is familiar with the site, and recommended Alternative 4. Another resident who also has a background in the field spoke in support at the public meeting for a version of digging up the soil, heating it to remove the contaminants, and returning the soil on site.

NEED FOR RISK ANALYSIS

As pointed out above ABC originally had a vision that the contamination which meets a “clean” threshold might be removed leaving a “clean” site; however the extent of the contamination and the cost and difficulty to clean it up was not feasible for some cases at the Superfund site. This resulted in leaving the contamination in place — but capped. It is ABC’s understanding that this feasibility requirement to clean the Point and surrounding nearshore also will leave some of the contamination to remain at the site but immobilized. Thus we would like to recommend a risk analysis should be added to Section 6 and 9: “Risk - regarding the probability the chosen alternative would sustain some sort of failure, and what the consequences and repair would be.” I have served on several boards of scientific societies which carried out risk analysis, albeit with different situations. Risk in Section 6 is defined as health and ecological risk which is of course important. However here I use Risk as it pertains to possible problems which could arise with each alternative. Potential problems should be listed along with an estimate of their probability of occurrence and ramifications. Examples would be if the aquitard were damaged due to a mistake in the depth of the auger, or somehow contaminated water flow entered into Puget Sound during land or nearshore digging. One possibility for a source of risk analysis, including probability, might be to cite similar sites with similar conditions and similar cleanup methods. Given limited data this could be a short analysis, but it would provide the community with EPA’s confidence in the various alternatives – many of which probably have similar Risk analyses.

BASELINE

Perhaps the most-asked question ABC receives from Bainbridge residents is whether it is safe to go into the water at the sandy west beach. This beach has become a real destination, especially with the recent warm weather. ABC cites the CDC results and refers them to the July 2009 report by HHS/CDC:

<http://www.atsdr.cdc.gov/HAC/pha/WyckoffWoodTreatingFacility/WyckoffEagleHarborSuperfundSite7-22-09.pdf>

I am not sure if this document has been updated. If it hasn’t ABC would recommend an updated report which would serve as a baseline before the cleanup of the Point is undertaken. Repeating the same measurement after all the operations have been completed would assure residents that the cleanup of the adjacent OU site had no effect on the safety of swimming at the West beach.

OTHER COMMENTS

Although there eventually will be many relatively minor details which accompany the chosen alternative, ABC would like to document its thoughts while there is an opportunity.

Noise. ABC recommended that a vibration device be used for the original installation of the sheet pile wall instead of a steam hammer for lower noise levels. This was appreciated by the neighbors, and any noise abatements for the chosen alternative will likewise be appreciated.

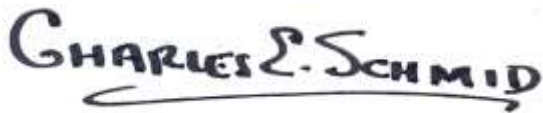
Traffic. The use of barges to transport equipment and materials has been brought up to minimize truck traffic.

Lowering of Sheet Pile Wall. The height of the sheet pile wall could be made lower from its present height, even taking sea level rise into account. Another option would be to slope the beach in front of the wall which will protect small fish which need shallow water to avoid predators. Any design which results in a more natural shoreline in appearance and function would be welcome.

Documentation of Cleanup. The 100 year history of the Creosote Plant has been documented with words and photographs. But there is a 30+ year history of the transition from a contaminated site to a park and national monument which needs to be documented with words and photos. This history would serve not only as a reminder that Superfund sites can be reclaimed, but also the high cost to restore sites could, and can be avoided by simple acts of prevention.

Roads. It appears all the alternatives will require re-routing of the entrance road down to the site from Eagle Harbor Drive and also provide public access to the water. ABC and members of the Pritchard Park Advisory Design Committee would appreciate being involved when the preliminary cleanup designs are drawn up. In addition shaping the terrain of the Point is important – but we realize this is a long way away – but then again the cleanup has come a long way in the three decades.

Thank you for considering ABC's comments, and we look forward to EPA's selection and implementation of one or a combination of the alternatives presented. Also ABC would like to compliment EPA on producing Reference 1 – the fold-out maps and photos were especially helpful in understanding the status of the site.

A handwritten signature in dark ink that reads "CHARLES E. SCHMID". The signature is written in a cursive, slightly slanted style with a horizontal line underneath the name.

Secretary/Treasurer

cc: Dale Spoor, President

Corrections to Report

Item 4.2 says "City of Bainbridge Island, which purchased the property from EPA in 2002." Technically speaking I believe the City purchased the land from Pacific Sound Resources Company which was a trust with a trustee. Perhaps you might check with someone at EPA familiar with the Site. See <http://www.bainbridgereview.com/news/19678454.html>.